

**Geneva Energy Maine, LLC
Franklin County
Strong, Maine
A-342-71-N-M (SM)**

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #1**

After review of the air emissions license application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., §344 and §590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Geneva Energy Maine, LLC (Geneva Energy) submitted a minor revision request to extend the submittal date for the wood dryer compliance monitoring plan. A request was also submitted to extend the submittal date for the VOC tons/year calculation method. Geneva Energy Maine, LLC is licensed to operate an existing wood fired boiler and to install and operate a new wood chip dryer for the processing of wood pellets.

B. Application Classification

The requests for the dryer compliance monitoring plan and VOC ton/year calculation method submittal extensions do not include any change in licensed emissions, therefore the Department has classified the application as a minor revision. The application has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (last amended December 24, 2005).

II. MINOR REVISION DESCRIPTION

A. Submittal Extensions

Geneva Energy was issued air emission license A-342-71-M-N on December 28, 2007 and has requested a revision to the due dates of the wood dryer compliance monitoring plan and the VOC tons/year calculation method. The facility is moving forward with the installation of a dryer and it is expected to be in operation by the summer of 2008. However, a design review is in process which may result in possible modifications to the initial wood chip dryer plans.

The current license includes the following conditions for the dryer:

“(17)(C) Geneva Energy shall ensure that there is a continuous wet moisture layer across the dryer at the proper depth to minimize particulate emissions and that the dryer will be operated within the manufacturers recommended temperature range. A compliance monitoring plan shall be submitted to the Department within 60 days of the issuance of this license detailing how these requirements will be met, including a proposal of a minimum wet moisture layer depth. [06-096 CMR 115, BACT]”

and:

“(17)(D) Geneva Energy shall limit VOC emissions from the dryer to 45.4 tons/year. A description of the method used to calculate compliance with the VOC tons/year limit shall be submitted to the Bureau of Air Quality within 30 days of the issuance of this license [06-096 CMR 115, BACT]”

Geneva Energy has requested that the submittal dates occur once the dryer plans have been finalized. Due to possible equipment changes from the original application, the Department approves extending submittal requirements for the dryer compliance monitoring plan and VOC tons/year calculation method to within 30 days from initial start-up of the dryer.

B. Annual Emissions

Annual emissions for Geneva Energy will not be changing with this minor revision. Geneva Energy shall continue to be limited to the following annual emissions, based on a 12 month rolling total, and calculated from an annual fuel limit of 21,000 tons/year wood waste (55% moisture) and dryer emissions:

**Total Licensed Annual Emissions for the Facility
Tons/year
(used to calculate the annual license fee)**

	PM	PM₁₀	SO₂	NO_x	CO	VOC
Boiler	22.7	22.7	3.0	22.7	76.5	4.5
Dryer	1.5	1.5	-	-	-	45.4
Total TPY	24.2	24.2	3.0	22.7	76.5	49.9

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-342-71-N-M subject to the conditions in air emission license A-342-71-M-N and the following conditions.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

The following condition shall replace condition (17) in air emission license A-342-71-M-N:

(17) Dryer #1

- A. Emissions from the Dryer's ducts shall not exceed the following totals [06-096 CMR 115, BACT]:

PM (lb/hr)	PM₁₀ (lb/hr)	VOC (lb/hr)
0.34	0.34	13.7

- B. Visible emissions from the dryer exhaust points shall not exceed 20% opacity on a 6-minute block average basis, except for no more than one 6-minute block average in a 3-hour period. [06-096 CMR 101]
- C. Geneva Energy shall ensure that there is a continuous wet moisture layer across the dryer at the proper depth to minimize particulate emissions and that the dryer will be operated within the manufacturer's recommended temperature range. A compliance monitoring plan shall be submitted to the Department within 30 days of initial start-up of the dryer detailing how these requirements will be met, including a proposal of a minimum wet moisture layer depth. If dryer plans change, Geneva Energy shall notify the Department prior to dryer installation and this license condition may be revised to reflect changes in dryer operations. [06-096 CMR 115, BACT]

- D. Geneva Energy shall limit VOC emissions from the dryer to 45.4 tons/year. A description of the method used to calculate compliance with the VOC tons/year limit shall be submitted to the Bureau of Air Quality within 30 days of initial start-up of the dryer. [06-096 CMR 115, BACT]
- E. Geneva Energy shall record each startup, shutdown, and malfunction event including start time, end time, duration, cause, and method utilized to minimize the duration of the event and/or to prevent a reoccurrence. [06-096 CMR 115]

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF , 2008.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAVID P. LITTELL, COMMISSIONER

The term of this license shall be concurrent with the term of air emission license A-342-71-M-N.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: February 4, 2008

Date of application acceptance: February 5, 2008

Date filed with the Board of Environmental Protection: _____

This Order prepared by Kathleen E. Tarbuck, Bureau of Air Quality.